

ESTTA Tracking number: **ESTTA676597**

Filing date: **06/05/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91218800
Party	Plaintiff Kimberly-Clark Worldwide, Inc.
Correspondence Address	KATHLEEN E MCCARTHY KING & SPALDING LLP 1185 AVENUE OF THE AMERICAS NEW YORK, NY 10036 UNITED STATES trademarks.legal@kcc.com, nytrademarks@kslaw.com, kmccarthy@kslaw.com, sluksenberg@kslaw.com, bbaber@kslaw.com
Submission	Stipulated/Consent Motion to Extend
Filer's Name	Steven Z. Luksenberg
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Signature	/Steven Z. Luksenberg/
Date	06/05/2015
Attachments	Motion to Extend Dates (KC-Matosantos Tender-Puff Opp. 91218800).pdf(19538 bytes )

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
TRADEMARK TRIAL AND APPEAL BOARD

Kimberly-Clark Worldwide, Inc.	)	
	)	
Opposer,	)	
v.	)	Opposition No. 91218800
	)	
Matosantos Commercial Corp.,	)	
	)	
Applicant.	)	

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JOINT MOTION TO EXTEND DATES  
PURSUANT TO SETTLEMENT DISCUSSIONS

Kimberly-Clark Worldwide, Inc. (“Opposer”), by and through its undersigned counsel of record, and with the consent of Applicant Matosantos Commercial Corp. (“Applicant”) provided via email from counsel for the Applicant on June 5, 2015, hereby moves the Board, pursuant to 37 CFR § 2.117(c), to extend the dates in the subject opposition proceedings for a period of ninety (90) days, pursuant to the schedule set forth below, to enable the parties time to continue settlement negotiations.

Following the Board’s Order dated January 20, 2015, the parties discussed settlement and conducted the discovery conference. The parties have also discussed timing for the service of initial disclosures and have agreed to postpone service of disclosures and discovery to allow the parties further time to investigate potential settlement options before incurring legal expenses in connection with the proceeding.

Accordingly, the parties submit this motion to extend all deadlines as set forth in the proposed schedule provided herein. In the event that the Board believes that good cause is required for the requested extension, the parties submit that good cause exists because of the ongoing settlement discussions.

For the foregoing reasons, the parties respectfully request that the proceeding’s deadlines be extended and re-set as set forth below:

Initial Disclosures:	9/3/2015
Expert Disclosures:	12/2/2015
Discovery Closes:	1/4/2016
Plaintiff's Pretrial Disclosures:	2/18/2016
Plaintiff's 30-day Trial Period Ends:	4/4/2016
Defendant's Pretrial Disclosures:	4/19/2016
Defendant's 30-day Trial Period Ends:	6/3/2016
Plaintiff's Rebuttal Disclosures	6/20/2016
Plaintiff's 15-day Rebuttal Period Ends	7/16/2016

Respectfully submitted, this 5th day of June, 2015

KING & SPALDING LLP

/Kathleen E. McCarthy/

Kathleen E. McCarthy

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Attorney for Opposer  
Kimberly-Clark Worldwide, Inc.

CERTIFICATE OF SERVICE

This is to certify that I have this day caused to be served on Applicant the foregoing Joint Motion To Extend Dates Pursuant to Settlement Discussions, by causing a true and correct copy thereof to be emailed and deposited in the United States mail, postage prepaid, addressed to the attorney of record for Applicant as follows:

SAMUEL F PAMIAS-PORTALATIN  
HOGLUND & PAMIAS PSC  
256 ELEANOR ROOSEVELT ST  
SAN JUAN, PR 00918  
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samuel@hhoglund.com, aileen@hhoglund.com, eida@hhoglund.com,  
veronica@hhoglund.com, jaime@hhoglund.com

This 5<sup>th</sup> day of June, 2015.

/Kathleen E. McCarthy/  
Kathleen E. McCarthy